

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

209803Orig1s000

209805Orig1s000

209806Orig1s000

SUMMARY REVIEW

Cross-Discipline Team Leader Review

Date	(see electronic signature)
From	William H. Chong
Subject	Cross-Discipline Team Leader Review
NDA/BLA # Supplement#	NDA 209803 NDA 209805 NDA 209806
Applicant	Merck Sharp and Dohme Corp
Date of Submission	December 19, 2016
PDUFA Goal Date	December 19, 2017
Proprietary Name / Non-Proprietary Name	STEGLATRO (ertugliflozin) STEGLUJAN (ertugliflozin and sitagliptin) SEGLUROMET (ertugliflozin and metformin hydrochloride)
Dosage form(s) / Strength(s)	<u>NDA 209803:</u> Once daily oral tablet (5 mg and 15 mg) <u>NDA 209805:</u> Once daily oral tablet (b) (4) 5 mg/100 mg, 15 mg/100 mg [ertugliflozin/sitagliptin]) <u>NDA 209806:</u> Twice daily oral tablet (2.5 mg/500 mg, 2.5 mg/1000 mg, 7.5 mg/500 mg, 7.5 mg/1000 mg [ertugliflozin/metformin hydrochloride])
Applicant Proposed Indication(s)/Population(s)	<u>NDA 209803:</u> adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus <u>NDA 209805:</u> adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus when treatment with both ertugliflozin and sitagliptin is appropriate <u>NDA 209806:</u> adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus (b) (4)
Recommendation on Regulatory Action	<u>NDA 209803:</u> Approval <u>NDA 209805:</u> Approval <u>NDA 209806:</u> Approval
Recommended Indication(s)/Population(s) (if applicable)	<u>NDA 209803:</u> adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus <u>NDA 209805:</u> adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus when treatment with both ertugliflozin and sitagliptin is appropriate <u>NDA 209806:</u> adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus (b) (4)

Review Team:

NDA 209803 (ertugliflozin):

Drug Substance Reviewer	Erika Englund
Drug Product Reviewer	Elise Luong
Microbiology/Process Reviewer	Chaoying Ma
Biopharmaceutics Reviewer	Hansong Chen
Facilities Reviewer	Allison Aldridge
Quality Technical Lead	Suong Tran
Pharmacology/Toxicology Reviewer	Jessica Hawes
QT-IRT	Moh Jee Ng
Clinical Pharmacology Reviewers	Suryanarayana Sista and Lian Ma
Efficacy Statistics Reviewer	Alexander Cambon
Safety Statistics Reviewer	Elande Baro
Clinical Reviewer	Frank Pucino
Office of Scientific Investigations	Cynthia Kleppinger
DPMH Reviewer	Carrie Ceresa
OPDP Reviewer	Meena Ramachandra
DMPP Reviewer	Sharon Williams
DRISK Reviewer	Naomi Redd
Project Manager	Elizabeth Godwin

NDA 209805 (ertugliflozin and sitagliptin):

Drug Substance Reviewer	Erika Englund
Drug Product Reviewer	Ravindra Kasliwal
Microbiology/Process Reviewer	Hauy Chang
Biopharmaceutics Reviewer	Peng Duan
Facilities Reviewer	Krishna Ghosh
Environmental Assessment Reviewer	James Laurenson
Quality Technical Lead	Suong Tran
Pharmacology/Toxicology Reviewer	Jessica Hawes
Clinical Pharmacology Reviewer	Lei He
Efficacy Statistics Reviewer	Alexander Cambon
Safety Statistics Reviewer	Eland Baro
Clinical Reviewer	Frank Pucino
Office of Scientific Investigations	Cynthia Kleppinger
DPMH Reviewer	Carrie Ceresa
OPDP Reviewer	Meena Ramachandra
DMPP Reviewer	Sharon Williams
DRISK Reviewer	Naomi Redd
Project Manager	Elizabeth Godwin

NDA 209806 (ertugliflozin and metformin):

Drug Substance Reviewer	Erika Englund
Drug Product Reviewer	Elise Luong
Microbiology/Process Reviewer	Hong Yang
Biopharmaceutics Reviewer	Kalpana Paudel
Facilities Reviewer	Michael Klupal
Quality Technical Lead	Suong Tran
Pharmacology/Toxicology Reviewer	Jessica Hawes
Clinical Pharmacology Reviewers	Lei He and Lian Ma
Efficacy Statistics Reviewer	Alexander Cambon
Clinical Reviewer	Frank Pucino
Office of Scientific Investigations	Cynthia Kleppinger
DPMH Reviewer	Carrie Ceresa
OPDP Reviewer	Meena Ramachandra
DMPP Reviewer	Sharon Williams
DRISK Reviewer	Naomi Redd
Project Manager	Elizabeth Godwin

1. Benefit-Risk Assessment

Benefit-Risk Summary and Assessment

Type 2 diabetes mellitus (T2DM) is a condition of chronic impaired glucose homeostasis that leads to chronic hyperglycemia and increased risk for vascular complications (both microvascular and macrovascular). Therapies for T2DM have focused on improving glycemic control, as assessed by change in hemoglobin A1c (HbA1c). While there are multiple drug products approved both as individual and combination drug products (FCDP), many patients are unable to achieve glucose targets. While reasons for this are likely multifactorial, an argument that has been made is that there are an insufficient number of available therapies to adequately allow for individualized care.

In these New Drug Applications (NDAs), Merck Sharp and Dohme (hereafter referred to as the applicant) is proposing three antidiabetic drug products: ertugliflozin (a sodium glucose cotransporter-2 [SGLT2] inhibitor), ertugliflozin + sitagliptin (an SGLT2 inhibitor and a dipeptidyl peptidase-4 [DPP4] inhibitor), and ertugliflozin + immediate-release metformin (a biguanide). To support these three NDAs, the applicant has conducted seven phase 3 studies to demonstrate the glycemic lowering effect of ertugliflozin. From these studies, it can be concluded that ertugliflozin is better than placebo for improving glycemic control (as assessed using hemoglobin A1c [HbA1c]). This in turn should result in improved clinical outcomes (i.e., reduced cardiovascular complications) for patients with T2DM. The fixed combination drug products (FCDPs) have similarly demonstrated improved glycemic control with each of the components showing a contribution to the glycemic lowering effect.

Safety concerns for ertugliflozin include genital infections, urinary tract infections, hypoglycemia, volume depletion/hypotension, acute kidney injury, increases in hematocrit, increases in LDL-C, and lower limb amputations. Aside from lower limb amputations, concerns are consistent with other members of the SGLT2 inhibitor class. One member of the SGLT2 inhibitor class, canagliflozin, lists lower limb amputations as a risk in the prescribing information and includes a Boxed Warning. The basis for that comes from a meta-analysis based on a larger database than is currently available for ertugliflozin. Though there are a limited number of events to date in the ertugliflozin database, the signal of an increased risk for lower limb amputations that was seen is concerning. This potential risk was communicated though I do not believe that the current data are sufficient to warrant a Boxed Warning for ertugliflozin. The ongoing cardiovascular outcomes trial (CVOT) will inform whether further labeling would be appropriate in the future.

The assessment of cardiovascular safety was performed using a meta-analysis of clinical trial and included interim data from the ongoing cardiovascular outcomes trial (CVOT). Based on this assessment, excess cardiovascular risk as discussed in the 2008 "Diabetes Mellitus – Evaluating Cardiovascular Risk in New Antidiabetic Therapies to Treat Type 2 Diabetes" has been identified.

The safety profile of the FCDPs reflects the combined safety profiles of the components, and no clear potentiation of risk was observed.

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